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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:11-cr-20183
Judge: Lawson, David M.
MJ: Komives, Paul J.
Filed: 04-04-2011 At 09:23 AM
INFO USA V JACINDA JONES (EB)

D-1 JACINDA JONES,

Willful Infringement of Copyright -
17 U.S.C. § 506(a)(1)(A)
18 U.S.C. § 2319 (b)(1)

Forfeiture - 18 U.S.C. § 2323

Defendant.

_____ /

INFORMATION

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(17 U.S.C. § 506 (a)(1)(A), 18 U.S.C. § 2319 (b)(1) – Willful Infringement of Copyright)

From on or about July 21, 2008 through January 16, 2009, in the Eastern District of Michigan, and elsewhere, Defendant,

JACINDA JONES

did willfully, for the purpose of private financial gain, infringe the copyrights of copyrighted works, that is, computer software of Intuit Corporation and Microsoft Corporation, by the reproduction and distribution by electronic means, including by means of the Internet, during a 180-day period, of ten (10) or more copies of one or more of the copyrighted works, which had a retail value of more than \$2,500, all in violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1).

COUNT TWO

(17 U.S.C. § 506 (a)(1)(A), 18 U.S.C. § 2319 (b)(1) – Willful Infringement of Copyright)

From on or about January 17, 2009 through July 15, 2009, in the Eastern District of Michigan, and elsewhere, Defendant,

JACINDA JONES

did willfully, for the purpose of private financial gain, infringe the copyrights of copyrighted works, that is, computer software of Adobe Systems Incorporated, Nero Incorporated, McAfee Corporation, Symantec Corporation and Microsoft Corporation, by the reproduction and distribution by electronic means, including by means of the Internet, during a 180-day period, of ten (10) or more copies of one or more of the copyrighted works, which had a retail value of more than \$2,500, all in violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1).

COUNT THREE

(17 U.S.C. § 506 (a)(1)(A), 18 U.S.C. § 2319 (b)(1) – Willful Infringement of Copyright)

From on or about July 16, 2009 through January 11, 2010, in the Eastern District of Michigan, and elsewhere, Defendant,

JACINDA JONES

did willfully, for the purpose of private financial gain, infringe the copyrights of copyrighted works, that is, computer software of Adobe Systems Incorporated, Symantec Corporation and Microsoft Corporation, by the reproduction and distribution by electronic means, including by means of the Internet, during a 180-day period, of ten (10) or more copies of one or more of the copyrighted works, which had a retail value of more than \$2,500, all in

violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1).

FORFEITURE

1. Defendant JACINDA JONES, if convicted of one or more of the violations alleged in Counts One, Two or Three of this Criminal Information, shall forfeit to the United States as part of the sentencing and pursuant to Fed. R. Crim. P. 32.2:

- a. Any article trafficked in or made in violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1) , pursuant to Title 18, United States Code, Section 2323(a) & (b);
- b. Any property used and intended to be used, in any manner or part to commit and to facilitate the commission of offenses in violation of in violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1), pursuant to Title 18, United States Code, Section 2323(a) & (b);
- c. Any property constituting, and derived from, any proceeds obtained directly or indirectly as a result of the commission of offenses in violation of in violation of Title 17, United States Code, Section 506 (a)(1)(A) and Title 18, United States Code, Section 2319 (b)(1), pursuant to Title 18, United States Code, Section 2323(a) & (b); and
- d. Any other property belonging to the defendant, up to the value of the property subject to forfeiture, if any property subject to forfeiture: (1) cannot be located upon exercise of due diligence; (2) has been transferred to, sold to, or deposited with a third person; (3) has been placed beyond the jurisdiction of the Court; (4) has been substantially diminished in value; or (5) has been commingled with other property that cannot be subdivided without difficulty.

2. The property subject to forfeiture under paragraph 1 includes, but is not limited to the following property seized on March 22, 2010 from 9947 Joan Circle, Ypsilanti, Michigan:

- a. Ninety-five (95) Computer Media Disks

b. One (1) Acer brand Aspire X1700 Desktop Computer bearing serial number 90801356730

c. One (1) Acer brand MS2211 Laptop Computer bearing serial number LXE770X0138190C8C2200

d. One (1) IBM brand IC35L020AVVA07 Hard Drive bearing serial number TH-02M919-12567-261-0

(All in accordance with Title 18, United States Code, Sections 982(a), 2323(a) &(b), Title 28, United States Code, Section 2461(c), and Title 21, United States Code, Section 853(p)).

BARBARA L. McQUADE
United States Attorney

s/ Ross I. MacKenzie
Ross I. MacKenzie
Assistant United States Attorney
Chief, Economic Crimes Unit

s/ Terrence Berg
Terrence Berg
Assistant United States Attorney

s/ Thomas Dougherty
Thomas Dougherty
Trial Attorney
Computer Crime and Intellectual
Property Section
Criminal Division
U.S. Department of Justice

Dated: April 4, 2011

United States District Court
Eastern District of Michigan

Criminal Case Co

Case: 2:11-cr-20183
Judge: Lawson, David M.
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete...

Reassignment/Recusal Information This matter was opened in the USAO prior to August 15, 2008 []

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials:

Case Title: USA v. Jacinda Jones

County where offense occurred : Washtenaw

Check One: ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☒ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section

below].

Superseding Case Information

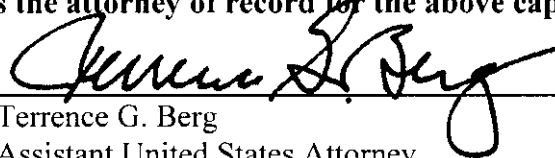
Superseding to Case No: _____ **Judge:** _____

☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Attorney is the attorney of record for the above captioned case.

April 4, 2011
Date


 Terrence G. Berg
 Assistant United States Attorney
 211 West Fort Street, Suite 2001
 Detroit, MI 48226
 telephone: (313) 226-9160
 facsimile: (313) 226-2873
 e-mail: Terrence.berg@usdoj.gov

Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.